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Attorneys for Plaintiff,  
SATORI MOVEMENT, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SATORI MOVEMENT, INC.

Plaintiff,

vs.

CRFT MANUFACTURING, INC. and  
CANNACRAFT, INC.

Defendants.

CASE NO.:

**COMPLAINT**

**COMPLAINT**

For its Complaint against CRFT Manufacturing, Inc. and CannaCraft, Inc., Plaintiff Satori Movement, Inc. ("SMI") states as follows:

**NATURE OF THE ACTION**

1. This is a civil action for trademark infringement, dilution, unfair competition and cybersquatting under federal, state, and common law. Satori Movement, Inc. ("SMI"); the owner of four (4) federally registered trademarks featuring or consisting solely of its distinctive "SATORI" mark including an associated design mark (collectively, "Satori Trademarks" or "Registered Trademarks") brings this action because CRFT Manufacturing, Inc. ("CRFT") and CannaCraft, Inc. ("CCI") (collectively referred to as "Defendants") are unlawfully advertising and selling products and services under a confusingly similar name to SMI's trademarks, in violation and dilution of SMI's trademark rights. SMI seeks to enjoin Defendant's acts, to recover damages and Defendant's profits, and to secure other relief, including attorney fees and costs.

2. For over twenty (20) years, SMI has worked tirelessly to build its brand, and its portfolio of trademarks are representative of the considerable amount of goodwill SMI has established over these past two decades through continuous use of its Satori Trademarks on a wide range of goods and marketing efforts targeting consumers familiar with its related brand properties. Unfortunately, Defendant is trading in on SMI's reputation and goodwill by marketing marijuana products and services under the name Satori. As medical and recreational use of marijuana has become authorized under the laws of more and more states, Defendant's public use of the name has increased, as have Defendant's apparent ambitions with respect to continued use and growth of the name. This lawsuit is not a comment on any federal or state policy matters, medical or pharmaceutical issues, or choices in recreation. But SMI has a famous, valuable brand built through tremendous products and strong consumer confidence, and as a business matter must take appropriate steps to protect its rights.

### **THE PARTIES**

3. The SMI is a California corporation having a principal place of business at 1551 Nursery Way, Suite A, McKinleyville, CA 95519. Since at least as early as 1998, and prior to Defendant's use, SMI have used the trademarks Satori, Satori Movement and Satori Wheels, along with related marks and designs (collectively, the "SMI marks") in interstate commerce and globally in advertising and selling of clothing, sporting goods and related items made from hemp fabrics and that also include marijuana leaf designs.

4. On information and belief, Defendants are California Corporations having a principal place of business at 2330 Circadian Way, Santa Rosa, CA 95407. Defendants' unauthorized use of similar marks in connection with its own products and services infringes and dilutes SMI's trademark rights.

### **JURISDICTION AND VENUE**

5. This action arises under the federal Lanham Act, 15 U.S.C. §§ 1051, et seq.

6. This Court has jurisdiction over the subject matter of this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331, 1338(a), and 1338(b).

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1           7. This Court has personal jurisdiction over Defendants and venue is appropriate in this Court.  
 2 Defendants are entities that are subject to this Court's personal jurisdiction with respect to this action,  
 3 and it has sufficient contacts with California and with this District. In addition, a substantial part of  
 4 the events giving rise to SMI's claims occurred in this District.

5           8. Among other things, Defendants' marketing and advertising reach into California and into  
 6 this District; its confusion of consumers and dilution of SMI's trademark rights occur in California  
 7 and in this District, among other places; the harm to SMI's trademark rights and goodwill takes place  
 8 in this District; Defendants marketing their goods through their website by way of knowing and  
 9 repeated transmissions of computer files over the internet, including, on information and belief, to  
 10 customers in California and in this District; Defendant operates an interactive website that establishes  
 11 additional contact with residents of California and of this District; SMI's trademark rights arise from,  
 12 among other things, its business in this District, and the trademark rights are owned in this District;  
 13 and SMI's applications for trademark registrations originated from this District.

14           9. Defendants generate sales of their products over the internet, including with respect to  
 15 California, through its websites <<https://satorichocolates.com/>> and <<https://www.cannacraft.com/>>.  
 16 It sells "cannabis infused chocolates," to customers through cannabis delivery services and  
 17 dispensaries in the State of California. The products are marketed in connection with the SMI  
 18 trademarks on the website and the merchandise itself also bears the SMI trademarks.

19           10. In addition to direct sales of merchandise out of which this action arises, Defendants'  
 20 website also engages in a very high level of interactivity. The website has an interactive "Contact  
 21 Us" page in which communications can be sent to Defendant directly through a web form  
 22 submission. The web form solicits information about the contacting user, including his or her name,  
 23 state, zip code and email address. The web form includes a box for the user to type a private  
 24 message.

25           11. Defendants' websites also allow and encourage customers to use an interactive form to  
 26 locate distributors of its products sold under the SMI trademark. They provide hyperlinked icons that  
 27 direct the website user to Defendants' social media feeds, encouraging the user to "follow"  
 28 Defendants. These social media feeds broadcast yet more infringing and dilutive use of the SMI



1 trademarks. The websites also request users to post photographs that feature the SMI trademarks and  
2 to link to its Instagram account.

3 12. Defendants' Facebook page also advertises encourages users to "Drop us a comment" to  
4 receive free information. Additionally, it offers links to news releases regarding Defendants'  
5 infringing and dilutive activities. Overall, it is on the high end of the spectrum of website  
6 interactivity.

7 13. On information and belief, as a foreseeable and intended result of Defendants' release of  
8 marijuana products with the SMI trademarks (as well as Defendants' efforts to preserve and promote  
9 the link between said marijuana and the brand) Defendants' marijuana has been sold in California in  
10 connection with the SMI trademarks. Multiple industry peers and consumers within California have  
11 contacted SMI and expressed confusion associating the SMI trademarks with said marijuana products  
12 produced by Defendants.

### 13 GENERAL ALLEGATIONS

14 14. SMI is a privately held company based in the Humboldt, California area. It is an  
15 extremely well-known globally recognized brand within the hemp and cannabis lifestyle industry  
16 including products featuring marijuana leaves sold under the SMI marks. The original SMI® has  
17 been sold in commerce for over a decade, and the entire company has been named SMI since 1998.  
18 Products bearing the SMI marks are targeted to consumers who purchase goods within and relating to  
19 the cannabis industry, resulting in the competitive proximity of the products under consideration  
20 being quite high. SMI takes pride in selling high-quality products, and it chooses to put the SMI  
21 marks only on products that meet rigorous development standards. SMI has sold products bearing its  
22 SMI marks over the last 20 years with sales during this period in excess of \$10,000,000.

23 15. SMI's products branded with the SMI marks are marketed and sold in retail stores, at  
24 festivals and on line. SMI has invested a great deal in the SMI marks.

25 16. SMI has purchased advertising, print advertising, online video, social media, including  
26 advertisements in cannabis industry magazines, publications and websites, and appeared on local  
27 television programs discussing the SMI product.

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17. In order to protect the substantial goodwill in its products SMI owns the following trademarks:

(1) "SATORI" (Reg. No. 3564639; IC class 25; for use on apparel goods) Registration date 01/20/09

SATORI

(2) "SATORI MOVEMENT" (Reg. No. 3350869; IC class 25; for use on apparel goods) Registration 12/11/07.



(3) "SATORI WHEELS" (Reg. No. 3342675; IC 28; for use on sporting goods, but namely, skateboard wheels and hardware accessories) Registration date 11/27/07.

SATORI WHEELS

(4) A design mark (Reg. No. 77490565; IC 25, 28 and 35; for use on a wide range of apparel goods, and in connection with SMI's global advertising initiatives in support of its products.)

(5) Linked Logo, (Registration No. 3625820, Registered 5/26/07).



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1 18. Copies of the registration certificates and status printouts for the registrations, taken from  
2 the U.S. Patent and Trademark Office's Trademark Status Document Retrieval are attached Exhibit  
3 A.

4 19. The existence of these valid and subsisting federal trademarks constitutes prima facie  
5 evidence of trademark registrations and of the ownership and validity of SMI marks.

6 20. Moreover, Registration Nos. 3564639; 3350869; 3342675; and 3655820 for use on a wide  
7 range of apparel goods, and in connection with SMI's global advertising initiatives in support of its  
8 products and are incontestable pursuant to 15 U.S.C. § 1065, which constitutes exclusive right to use  
9 these marks specified in the registrations pursuant to 15 U.S.C. §§ 1065 and 1115 b.

10 21. SMI has used these marks without interruption since 08/01/1998 (Registration Nos.  
11 3564639; 3350869; and 3342675) and 01/01/2000 (Registration No. 3625820). To its knowledge, its  
12 SMI marks has been exclusive during this time in relation to the products set forth and described  
13 above, and no other entity has the right to use a mark similar to the SMI marks in connection with the  
14 services set forth and described above or related goods or services.

15 22. Through its continuous use of the SMI marks over more than a decade, SMI has built up  
16 substantial goodwill in the mark, and the relevant consumers have come to recognize SMI as the  
17 source of high-quality products for consumers who purchase goods within and relating to the  
18 cannabis industry.

19 23. SMI has advertised its products throughout the United States, including without limitation  
20 via its websites located at <<https://www.satorimovement.com/>>, <[satoriwheels.org](https://satoriwheels.org/)>, and  
21 <[cultureskate.com](https://cultureskate.com/)> and through its retail outlet and festivals, as well as the above-discussed  
22 advertising and marketing. SMI has received media coverage by local news agencies for its products.

23 24. On information and belief, Defendants are a provider of cannabis infused chocolates  
24 located in Northern California.

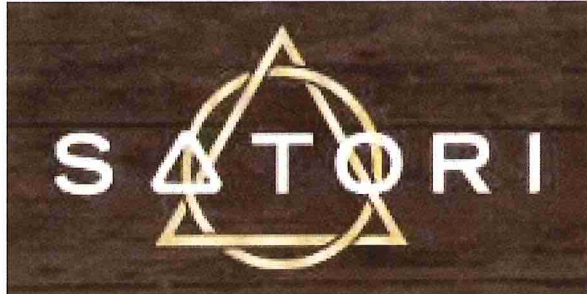
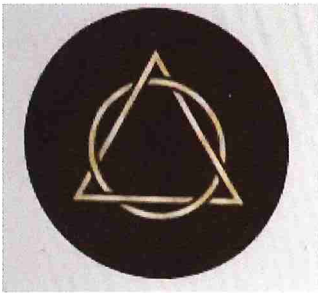
25 25. On information and belief, Defendant was aware of the existence of SMI's products prior  
26 to the creation of Defendants' Satori product and patterned its name and logo after SMI's  
27 trademarked name and logo.  
28



26. Defendant thus willfully infringes on SMI's trademark rights and dilutes the famous SMI mark. The name of Defendant's product was selected with the express purpose to exploit and trade on the goodwill and reputation that SMI had built in its SMI marks.

27. Defendants operate the websites <cannacraft.com> and <satorichocolates.com>. The interactive functionality and direct merchandising of Defendants website are discussed above.

Defendants' logos are:



28. On information and belief, Defendants have applied, without success, for registration of confusingly similar trademarks with the United States Patent and Trademark Office.

29. Defendants' use of the marks similar in design to the SMI trademarks is in connection with goods marketed to the same demographic of consumers that SMI targets and creates a likelihood of confusion between Defendants' Infringing Mark and SMI's Satori Trademarks, as well as the source of the SMI products the marks have come to represent and be associated with.

30. Defendants' use of the SMI trademarks is confusingly similar to SMI's use of the SMI marks. The two companies both sell goods focused on the cannabis culture, and are located in Northern California. Moreover, as to all products and services, Defendants are willfully infringing the SMI marks to create an association in its consumers' minds between Defendants and SMI for purposes of trading on SMI's reputation for cannabis related products. Defendants are intentionally trading off of SMI's name, reputation and goodwill.

31. Defendants' activities described above are without SMI's permission or consent.

32. On information and belief, Defendants' activities described above are willful.

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33. Defendants' activities described above have directly and proximately caused, and unless enjoined, will continue to cause, irreparable harm both to SMI and to consumers, who have an interest in being free from confusion, mistake, and deception.

34. SMI has no adequate remedy at law and will be irreparably harmed if Defendants are permitted to use the SMI trademarks in the United States in connection with its products and services.

### **COUNT ONE**

#### **(Trademark Dilution Under 15 U.S.C. § 1125(c))**

35. SMI incorporates by reference each and every paragraph above as if re-stated herein.

36. The SMI marks are famous.

37. Defendants adopted their dilutive SMI trademarks after the SMI marks became famous.

38. The use of Defendants' SMI trademarks is likely to cause, and does cause, dilution of the SMI mark.

39. The use of Defendants' SMI trademarks is likely to cause, and does cause a decrease in the ability of the SMI marks to maintain thier distinctiveness and close association with SMI and/or maintain its excellent reputation in the minds of consumers.

40. Defendants' use of their dilutive SMI trademarks is commercial and in commerce.

41. Defendants' first use in commerce of its dilutive SMI trademarks began in 2016, many years after the SMI trademarks were first used on 08/01/1998 (Registration Nos. 3564639; 3350869; and 3342675) and 01/01/2000 (Registration No. 3625820). (the date of first use after which an award of damages/profits is available under the Lanham Act).

42. Defendants willfully intended to trade on the recognition of the famous SMI marks.

43. As a direct and proximate result of the foregoing acts of Defendants, SMI has suffered and will continue to suffer monetary damages in an amount that will be established at trial.

44. Defendants' dilution described herein irreparably harms SMI, and there is no adequate remedy at law. The balance of equities weighs in favor of an injunction.

### **COUNT TWO**

#### **(Trademark Infringement Under 15 U.S.C. § 1114(1))**

45. SMI incorporates by reference each and every paragraph above as if re-stated herein.



1 46. SMI has invested significant effort and funds in marketing and promoting its products  
 2 under the SMI marks. Consumers associate the famous SMI marks with a single producer or source  
 3 in the United States.

4 47. Defendants' infringing use of the SMI trademarks is confusingly similar to SMI's  
 5 trademarks.

6 48. Defendants' use of the marks in connection with the sale, offering for sale, distribution  
 7 and advertising of marijuana products, related services and products is likely to cause confusion, or to  
 8 cause mistake, or to deceive in violation of Section 32(1)(a) of the Lanham Act, 15 U.S.C. § 1114(1).

9 49. Defendants are creating a likelihood of confusion or mistake by purchasers as to the  
 10 sponsorship or approval of such products and services by SMI, or as to an affiliation with or approval  
 11 from SMI.

12 50. As a direct and proximate result of the foregoing acts of Defendants, SMI has suffered and  
 13 will continue to suffer monetary damages in an amount that will be established at trial.

14 51. On information and belief, Defendants' acts were in conscious and willful disregard of  
 15 SMI's rights, and the resulting damage to SMI is such as to warrant the trebling of damages in order  
 16 to provide just compensation.

17 52. Defendants' infringement described herein also irreparably harms SMI, and there is no  
 18 adequate remedy at law. The balance of equities weighs in favor of an injunction.

### 19 **COUNT THREE**

#### 20 **(Trademark Infringement Under 15 U.S.C. § 1125(a)(1)(A))**

21 53. SMI incorporates by reference each and every paragraph above as if re-stated herein.

22 54. By misappropriating, using and copying the SMI marks, Defendants are misrepresenting  
 23 and falsely describing to the consumers the origin, sponsorship, or approval of its products and  
 24 services. Defendants' use in commerce of the SMI trademarks in connection with its commercial  
 25 activities is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation,  
 26 connection, or association of Defendants with SMI, or as to the origin, sponsorship, or approval of  
 27 Defendants, its products, and its commercial activities, by or with SMI, in violation of the Lanham  
 28 Act, 15 U.S.C. § 1125 (a)(1)(A).

55. As a direct and proximate result of the foregoing acts of Defendants, SMI has suffered and will continue to suffer monetary damages in an amount that will be established at trial.

56. On information and belief, Defendants' acts were in conscious and willful disregard of SMI's rights, and the resulting damage to SMI is such as to warrant the trebling of damages in order to provide just compensation.

57. Defendants' activities described herein irreparably harm SMI, and there is no adequate remedy at law. The balance of equities weighs in favor of an injunction.

#### **COUNT FOUR**

##### **(Cybersquatting Under 15 U.S.C. § 1125(d))**

58. SMI incorporates by reference each and every paragraph above as if re-stated herein.

59. SMI's SMI marks are distinctive and famous.

60. Defendants have registered, trafficked in, and/or used the <cannacraft.com> and <satorichocolates.com> domain name.

61. The <satorichocolates.com> domain name is confusingly similar to and dilutive of the SMI marks.

62. On information and belief, Defendants have or had bad faith intent to profit from the SMI marks. As a direct and proximate result of Defendants' conduct, SMI has suffered, and will continue to suffer, monetary loss and irreparable injury to its business, reputation and goodwill.

#### **COUNT FIVE**

##### **(Common Law Trademark Infringement, Unfair Competition and Dilution)**

63. SMI incorporates by reference each and every paragraph above as if re-stated herein.

64. Defendants' activities described above constitute common law trademark infringement and misappropriation of the goodwill associated with SMI's SMI marks and constitute unfair competition in violation of California common law.

65. SMI's SMI marks are strong, distinctive and famous in the United States in general, and also in California and in the field of cannabis related products.

66. Defendants adopted its dilutive SMI marks after the SMI marks were first used in commerce, and indeed after the SMI marks had become famous.

67. The use of Defendants' SMI trademarks causes dilution of the SMI marks.

68. Defendants' use of its dilutive SMI trademarks is commercial and in commerce.

69. Defendants willfully intended to trade on the recognition of the famous, distinctive and strong SMI marks.

70. Defendants' dilution described herein irreparably harms SMI, and there is no adequate remedy at law. The balance of equities weighs in favor of an injunction.

### **REQUEST FOR RELIEF**

Wherefore, SMI respectfully requests that this Court enter judgment in its favor on each and every count set forth above and award it relief including, but not limited to, the following:

a. An Order holding that Defendants' actions described above infringe SMI's SMI marks and that Defendants' actions constitute trademark dilution, trademark infringement, cybersquatting, false designation of origin, passing off, unfair competition, and a deceptive trade practice under federal, state, and common law as detailed above;

b. An Order preliminarily and permanently enjoining Defendants, their employees, agents, officers, directors, shareholders, subsidiaries, related companies, affiliates, cultivators, distributors, dispensaries, dealers, and all persons in active concert or participation with any of them:

1) from using the SMI marks, the SMI trademarks, or any other trademarks, trade names, logos, and other names or identifiers that are the same as or confusingly similar to said marks or that tend to continue any link in consumers' minds between Defendants and SMI or the SMI marks, in any manner or form, in connection with any goods or services, and

2) from representing or suggesting, by any means whatsoever, directly or indirectly, that Defendants, any goods or services offered by Defendants, or any activities undertaken by Defendants, are sponsored or approved by, or are or have at any time been associated, affiliated, or connected with SMI in any way;

c. An Order requiring Defendants to deliver up for destruction all advertisements, promotional materials, labels, signs, pictures, letterhead, plaques, clothing and any other materials



1 containing infringing marks and/or false claims in their possession, custody, or control, or in the  
 2 possession, custody, or control of any of their agents or representatives;

3 d. An Order requiring Defendants to disable the website located at  
 4 <satorichocolates.com> or links or references to Satori on <www.cannacraft.com> and requiring  
 5 Defendants to transfer the <satorichocolates.com> domain to SMI;

6 e. An Order directing Defendants, with respect to all trademark registration systems, to  
 7 withdraw, cancel or otherwise extinguish all applications and registrations for trademarks containing  
 8 the word "Satori," containing an image of Satori or similar to its link logo or containing any other  
 9 words or images that are likely to cause confusion with the SMI marks, or furthering or continuing in  
 10 any way the confusing and dilutive association between Defendants and the SMI marks.

11 f. An Order directing Defendants to file with this Court and serve on SMI's attorneys,  
 12 thirty (30) days after the date of entry of any injunction, a report in writing and under oath setting  
 13 forth in detail the manner and form in which it has complied with the Courts' injunctions;

14 g. An Order requiring Defendants to account for and pay to SMI any and all profits  
 15 arising from or related to Defendants' unlawful acts and that such profits be increased in accordance  
 16 with 15 U.S.C § 1117 and other applicable laws;

17 h. An Order requiring Defendants to pay SMI the full amount of damages caused by  
 18 Defendants' unlawful acts, and that such damages be trebled in accordance with 15 U.S.C. § 1117  
 19 and other applicable laws;

20 i. An Order requiring Defendants to pay SMI its costs and attorneys' fees in this action  
 21 pursuant to 15 U.S.C. § 1117 and other applicable laws; and

22 j. Any other relief as the Court may deem appropriate.

23 DATED: November 2, 2018

**VAN DE POEL, LEVY, ARNEAL & SEROT, LLP**

24  
 25 By: /s/  
 26 DANIEL A. SEROT  
 27 Attorney for Plaintiff,  
 28 SATORI MOVEMENT, INC.

# **EXHIBIT “A”**

Int. Cls.: 25, 28 and 35

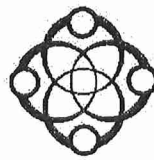
Prior U.S. Cls.: 22, 23, 38, 39, 50, 100, 101 and 102

Reg. No. 3,625,820

United States Patent and Trademark Office

Registered May 26, 2009

TRADEMARK  
SERVICE MARK  
PRINCIPAL REGISTER



SATORI MOVEMENT, INC. (CALIFORNIA CORPORATION)  
3069 17TH STREET  
SAN FRANCISCO, CA 94110

FOR: MEN'S, WOMEN'S, AND CHILDREN'S CLOTHING, NAMELY, TANK TOPS, SHIRTS, SKIRTS, PANTS, DRESSES, SHORTS, JUMPERS, CAPRIS, LEGGINGS, PAJAMAS, ROBES, JERSEYS, SWIMWEAR, WETSUITS, BATHING SUITS, BIKINIS, COVER-UPS, UNDERWEAR, SOCKS, GLOVES, BELTS, TIES, VESTS, AND JACKETS; NATURAL FIBER CLOTHING, NAMELY, CLOTHING FEATURING HEMP, BAMBOO, AND ORGANIC CONTENT, NAMELY, TANK TOPS, SHIRTS, SKIRTS, PANTS, DRESSES, SHORTS, JUMPERS, CAPRIS, LEGGINGS, PAJAMAS, ROBES, JERSEYS, SWIMWEAR, BATHING SUITS, BIKINIS, COVER-UPS, UNDERWEAR, SOCKS, GLOVES, BELTS, TIES, VESTS, JACKETS; HEADWEAR, NAMELY, CAPS AND VISORS; FOOTWEAR, NAMELY, SANDALS, SLIPPERS, BOOTS, AND ATHLETIC SHOES; AND WRISTBANDS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 1-1-2000; IN COMMERCE 1-1-2000.

FOR: SPORTING GOODS, NAMELY, SKATEBOARDS AND ACCESSORIES THEREFOR, NAMELY, SKATEBOARD DECKS, TRUCKS, BEARINGS, BINDINGS, WHEELS, SAFETY STRAPS AND PORTABLE CARRIERS FOR SKATEBOARDS, ATHLETIC

IC PROTECTIVE PADS AND PADDING FOR SKATEBOARDING, IN-LINE SKATING AND ROLLER SKATING; SNOW BOARDS AND ACCESSORIES THEREFOR, NAMELY, SNOW BOARD BINDINGS, SAFETY STRAPS AND PORTABLE CARRIERS FOR SNOW BOARDS, ATHLETIC PROTECTIVE PADS AND PADDING FOR SNOW BOARDING; SURFBOARDS AND RELATED ACCESSORIES THEREFOR, NAMELY, WAX, LEASHES, WAX COMBS AND NOSE GUARDS, SWIM BOARDS AND SWIM FLOATS FOR RECREATIONAL USE, IN CLASS 28 (U.S. CLS. 22, 23, 38 AND 50).

FIRST USE 1-1-2000; IN COMMERCE 1-1-2000.

FOR: ADVERTISING OF GLOBAL CONSUMER PRODUCTS, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

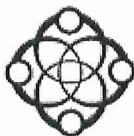
FIRST USE 1-1-2000; IN COMMERCE 1-1-2000.

THE MARK CONSISTS OF FOUR OVERLAPPING CIRCLES OF GEOMETRIC DESIGN WITH A SMALLER CIRCLE POSITIONED AT THE OUTER EDGE ON EACH OF THE FOUR CIRCLES.

SER. NO. 77-490,565, FILED 6-4-2008.

SUZANNE BLANE, EXAMINING ATTORNEY





**Goods and Services** IC 025. US 022 039. G & S: Men's, women's, and children's clothing, namely, tank tops, shirts, skirts, pants, dresses, shorts, jumpers, capris, leggings, pajamas, robes, jerseys, swimwear, wetsuits, bathing suits, bikinis, cover-ups, underwear, socks, gloves, belts, ties, vests, and jackets; natural fiber clothing, namely, clothing featuring hemp, bamboo, and organic content, namely, tank tops, shirts, skirts, pants, dresses, shorts, jumpers, capris, leggings, pajamas, robes, jerseys, swimwear, bathing suits, bikinis, cover-ups, underwear, socks, gloves, belts, ties, vests, jackets; headwear, namely, caps and visors; footwear, namely, sandals, slippers, boots, and athletic shoes; and wristbands. FIRST USE: 20000101. FIRST USE IN COMMERCE: 20000101

IC 028. US 022 023 038 050. G & S: Sporting goods, namely, skateboards and accessories therefor, namely, skateboard decks, trucks, bearings, bindings, wheels, safety straps and portable carriers for skateboards, athletic protective pads and padding for skateboarding, in-line skating and roller skating; snow boards and accessories therefor, namely, snow board bindings, safety straps and portable carriers for snow boards, athletic protective pads and padding for snow boarding; surfboards and related accessories therefor, namely, wax, leashes, wax combs and nose guards, swim boards and swim floats for recreational use. FIRST USE: 20000101. FIRST USE IN COMMERCE: 20000101

IC 035. US 100 101 102. G & S: Advertising of global consumer products. FIRST USE: 20000101. FIRST USE IN COMMERCE: 20000101

**Mark Drawing Code** (2) DESIGN ONLY

**Design Search Code** 26.01.02 - Circles, plain single line; Plain single line circles  
26.01.16 - Circles touching or intersecting  
26.01.31 - Circles - five or more; Five or more circles

**Trademark Search Facility** SHAPES-CIRCLE Circle figures or designs including semi-circles and incomplete circles  
**Classification Code** SHAPES-DIAMONDS Diamond shaped designs including shaded or more than one diamond  
SHAPES-MISC Miscellaneous shaped designs  
SHAPES-OVALS Oval figures or designs including incomplete ovals and one or more ovals

**Serial Number** 77490565

**Filing Date** June 4, 2008

**Current Basis** 1A

**Original Filing Basis** 1A

**Published for Opposition** March 10, 2009

**Registration Number** 3625820

**Registration Date** May 26, 2009

**Owner** (REGISTRANT) Satori Movement, Inc. CORPORATION CALIFORNIA 2216 McKinleyville Ave McKinleyville CALIFORNIA 95519

**Attorney of Record** Daniel A Serot

**Description of Mark** Color is not claimed as a feature of the mark. The mark consists of four overlapping circles of geometric design with a smaller circle positioned at the outer edge on each of the four circles.

**Type of Mark** TRADEMARK. SERVICE MARK

**Register** PRINCIPAL

**Affidavit Text** SECT 15. SECT 8 (6-YR).

**Live/Dead Indicator** LIVE

Int. Cl.: 28

Prior U.S. Cls.: 22, 23, 38 and 50

**United States Patent and Trademark Office**

**Reg. No. 3,342,675**

Registered Nov. 27, 2007

**TRADEMARK  
PRINCIPAL REGISTER**

**SATORI WHEELS**

SATORI MOVEMENT (CALIFORNIA CORPORATION)  
3069 17TH STREET/P.O. BOX 410117  
SAN FRANCISCO, CA 94141

NO CLAIM IS MADE TO THE EXCLUSIVE  
RIGHT TO USE "WHEELS", APART FROM THE  
MARK AS SHOWN.

FOR: SPORTING GOODS, NAMELY, SKATE-  
BOARD WHEELS, SKATEBOARD HARDWARE AC-  
CESSORIES, NAMELY, BOLTS, BUSHINGS, NUTS,  
MOUNTING HARDWARE AND BEARINGS, IN  
CLASS 28 (U.S. CLS. 22, 23, 38 AND 50).

THE ENGLISH TRANSLATION OF THE JAPA-  
NESE WORDING "SATORI" IS "ENLIGHTEN-  
MENT."

FIRST USE 8-1-1998; IN COMMERCE 8-1-1998.

SER. NO. 77-042,968, FILED S.R. 11-13-2006 AM.  
P.R. 4-4-2007.

THE MARK CONSISTS OF STANDARD CHAR-  
ACTERS WITHOUT CLAIM TO ANY PARTICULAR  
FONT, STYLE, SIZE, OR COLOR.

BARNEY CHARLON, EXAMINING ATTORNEY

## SATORI WHEELS

Word Mark	SATORI WHEELS
Translations	The English translation of the Japanese wording "SATORI" is "enlightenment."
Goods and Services	IC 028. US 022 023 038 050. G & S: Sporting goods, namely, skateboard wheels, skateboard hardware accessories, namely, bolts, bushings, nuts, mounting hardware and bearings. FIRST USE: 19980801. FIRST USE IN COMMERCE: 19980801
Standard Characters Claimed	
Mark Drawing Code	(4) STANDARD CHARACTER MARK
Serial Number	77042968
Filing Date	November 13, 2006
Current Basis	1A
Original Filing Basis	1A
Published Opposition	for September 11, 2007
Date Amended to Current Register	April 4, 2007
Registration Number	3342675
Registration Date	November 27, 2007
Owner	(REGISTRANT) SATORI MOVEMENT CORPORATION CALIFORNIA 1551 Nursery Way, Suite A McKinleyville CALIFORNIA 95519
Attorney of Record	DANIEL A. SEROT
Disclaimer	NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "wheels" APART FROM THE MARK AS SHOWN
Type of Mark	TRADEMARK
Register	PRINCIPAL
Affidavit Text	SECT 15. SECT 8 (6-YR). SECTION 8(10-YR) 20170424.
Renewal	1ST RENEWAL 20170424
Live/Dead Indicator	LIVE



Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

Reg. No. 3,564,639

United States Patent and Trademark Office

Registered Jan. 20, 2009

TRADEMARK  
PRINCIPAL REGISTER

SATORI

SATORI MOVEMENT, INC. (CALIFORNIA CORPORATION)

3069 17TH STREET

SAN FRANCISCO, CA 94110

FOR: MEN'S, WOMEN'S, AND CHILDREN'S CLOTHING, NAMELY, TANK TOPS, SHIRTS, SKIRTS, PANTS, DRESSES, SHORTS, JUMPERS, CAPRIS, LEGGINGS, PAJAMAS, ROBES, JERSEYS, SWIMWEAR, WETSUITS, BATHING SUITS, BIKINIS, COVER-UPS, UNDERWEAR, SOCKS, GLOVES, BELTS, TIES, VESTS, AND JACKETS; NATURAL FIBER CLOTHING, NAMELY, CLOTHING FEATURING HEMP, BAMBOO, AND ORGANIC CONTENT, NAMELY, TANK TOPS, SHIRTS, SKIRTS, PANTS, DRESSES, SHORTS, JUMPERS, CAPRIS, LEGGINGS, PAJAMAS, ROBES, JERSEYS, SWIMWEAR, BATHING SUITS, BIKINIS, COVER-UPS, UNDERWEAR, SOCKS, GLOVES, BELTS, TIES, VESTS, JACKETS; HEADWEAR, NAMELY, CAPS AND VISORS; FOOTWEAR, NAMELY, SANDALS,

SLIPPERS, BOOTS, AND ATHLETIC SHOES; AND WRISTBANDS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 8-1-1998; IN COMMERCE 8-1-1998.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

OWNER OF U.S. REG. NOS. 3,342,675 AND 3,350,869.

THE FOREIGN WORDING IN THE MARK TRANSLATES INTO ENGLISH AS "ENLIGHTENMENT".

SEC. 2(F).

SER. NO. 77-532,749, FILED 7-28-2008.

SUZANNE BLANE, EXAMINING ATTORNEY

# SATORI

<b>Word Mark</b>	SATORI
<b>Translations</b>	The foreign wording in the mark translates into English as "ENLIGHTENMENT".
<b>Goods and Services</b>	IC 025. US 022 039. G & S: Men's, women's, and children's clothing, namely, tank tops, shirts, skirts, pants, dresses, shorts, jumpers, capris, leggings, pajamas, robes, jerseys, swimwear, wetsuits, bathing suits, bikinis, cover-ups, underwear, socks, gloves, belts, ties, vests, and jackets; natural fiber clothing, namely, clothing featuring hemp, bamboo, and organic content, namely, tank tops, shirts, skirts, pants, dresses, shorts, jumpers, capris, leggings, pajamas, robes, jerseys, swimwear, bathing suits, bikinis, cover-ups, underwear, socks, gloves, belts, ties, vests, jackets; headwear, namely, caps and visors; footwear, namely, sandals, slippers, boots, and athletic shoes; and wristbands. FIRST USE: 19980801. FIRST USE IN COMMERCE: 19980801
<b>Standard Characters Claimed</b>	
<b>Mark Drawing Code</b>	(4) STANDARD CHARACTER MARK
<b>Serial Number</b>	77532749
<b>Filing Date</b>	July 28, 2008
<b>Current Basis</b>	1A
<b>Original Filing Basis</b>	1A
<b>Published for Opposition</b>	November 4, 2008
<b>Registration Number</b>	3564639
<b>Registration Date</b>	January 20, 2009
<b>Owner</b>	(REGISTRANT) SATORI MOVEMENT, INC. CORPORATION CALIFORNIA 2216 McKinleyville Ave McKinleyville CALIFORNIA 95519
<b>Attorney of Record</b>	DANIEL A SEROT
<b>Prior Registrations</b>	3342675;3350869
<b>Type of Mark</b>	TRADEMARK
<b>Register</b>	PRINCIPAL-2(F)
<b>Affidavit Text</b>	SECT 15. SECT 8 (6-YR). SECTION 8(10-YR) 20180510.
<b>Renewal</b>	1ST RENEWAL 20180510
<b>Live/Dead Indicator</b>	LIVE

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

Reg. No. 3,350,869

**United States Patent and Trademark Office**

Registered Dec. 11, 2007

**TRADEMARK  
PRINCIPAL REGISTER**

**SATORI MOVEMENT**

SATORI MOVEMENT (CALIFORNIA CORPORATION)  
3069 17TH STREET  
P.O. BOX 410117  
SAN FRANCISCO, CA 94141

UNDERWEAR, SOCKS, GLOVES, BELTS, TIES, VESTS, JACKETS; HEADWEAR, NAMELY, CAPS AND VISORS; FOOTWEAR, NAMELY, SANDALS, SLIPPERS, BOOTS, AND ATHLETIC SHOES; AND WRISTBANDS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FOR: MEN'S, WOMEN'S, AND CHILDREN'S CLOTHING, NAMELY, TANK TOPS, SHIRTS, SKIRTS, PANTS, DRESSES, SHORTS, JUMPERS, CAPRIS, LEGGINGS, PAJAMAS, ROBES, JERSEYS, SWIMWEAR, WETSUITS, BATHING SUITS, BIKINIS, COVER-UPS, UNDERWEAR, SOCKS, GLOVES, BELTS, TIES, VESTS, AND JACKETS; NATURAL FIBER CLOTHING, NAMELY, CLOTHING FEATURING HEMP, BAMBOO, AND ORGANIC CONTENT, NAMELY, TANK TOPS, SHIRTS, SKIRTS, PANTS, DRESSES, SHORTS, JUMPERS, CAPRIS, LEGGINGS, PAJAMAS, ROBES, JERSEYS, SWIMWEAR, BATHING SUITS, BIKINIS, COVER-UPS,

FIRST USE 8-1-1998; IN COMMERCE 8-1-1998.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

THE ENGLISH TRANSLATION OF THE WORD "SATORI" IN THE MARK IS "ENLIGHTENMENT".

SER. NO. 77-042,948, FILED S.R. 11-13-2006 AM.  
P.R. 4-4-2007.

TIMOTHY FINNEGAN, EXAMINING ATTORNEY



# SATORI MOVEMENT

<b>Word Mark</b>	SATORI MOVEMENT
<b>Translations</b>	The English translation of the word "SATORI" in the mark is "ENLIGHTENMENT".
<b>Goods and Services</b>	IC 025. US 022 039. G & S: Men's, women's, and children's clothing, namely, tank tops, shirts, skirts, pants, dresses, shorts, jumpers, capris, leggings, pajamas, robes, jerseys, swimwear, wetsuits, bathing suits, bikinis, cover-ups, underwear, socks, gloves, belts, ties, vests, and jackets; natural fiber clothing, namely, clothing featuring hemp, bamboo, and organic content, namely, tank tops, shirts, skirts, pants, dresses, shorts, jumpers, capris, leggings, pajamas, robes, jerseys, swimwear, bathing suits, bikinis, cover-ups, underwear, socks, gloves, belts, ties, vests, jackets; headwear, namely, caps and visors; footwear, namely, sandals, slippers, boots, and athletic shoes; and wristbands. FIRST USE: 19980801. FIRST USE IN COMMERCE: 19980801
<b>Standard Characters Claimed</b>	
<b>Mark Drawing Code</b>	(4) STANDARD CHARACTER MARK
<b>Serial Number</b>	77042948
<b>Filing Date</b>	November 13, 2006
<b>Current Basis</b>	1A
<b>Original Filing Basis</b>	1A
<b>Published for Opposition</b>	September 25, 2007
<b>Date Amended to Current Register</b>	April 4, 2007
<b>Registration Number</b>	3350869
<b>Registration Date</b>	December 11, 2007
<b>Owner</b>	(REGISTRANT) SATORI MOVEMENT CORPORATION CALIFORNIA 1551 Nursery Way, Suite A McKinleyville CALIFORNIA 95519
<b>Attorney of Record</b>	DANIEL A. SEROT
<b>Type of Mark</b>	TRADEMARK
<b>Register</b>	PRINCIPAL
<b>Affidavit Text</b>	SECT 15. SECT 8 (6-YR). SECTION 8(10-YR) 20180108.
<b>Renewal</b>	1ST RENEWAL 20180108
<b>Live/Dead Indicator</b>	LIVE